

UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA

v.

Case No. 5:25-MJ-10 (MJK)

THOMAS FARR

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of December 2, 2024 in the county of Oswego in the Northern District of New York the defendant violated:

Code Section

18 U.S.C. § 2251(a)

Offense Description

Sexual Exploitation of a Child

This criminal complaint is based on these facts:
See Attached Affidavit

☒ Continued on the attached sheet.

LINDSEY R
VALENTINO

Digitally signed by LINDSEY R
VALENTINO
Date: 2025.01.21 09:59:28 -05'00'

Complainant's signature

Lindsey Valentino, Special Agent

Printed name and title

Attested to by the affiant in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

Date: 1/21/2025


Judge's signature

City and State: Syracuse, NY

Hon. Mitchell J. Katz, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Lindsey Valentino, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a criminal complaint and arrest warrant for Thomas FARR (“FARR”) with sexual exploitation of a child, in violation of Title 18, United States Code, Section 2251(a).

2. I am a Special Agent employed by the Department of Homeland Security, Homeland Security Investigations (“HSI”) since September 2019. I successfully completed the Criminal Investigatory Training Program and the Homeland Security Investigations Special Agent Training at the Federal Law Enforcement Training Center (“FLETC”) in Glynco, Georgia. While there, I received training in child exploitation investigations. In March 2023, I also received specialized undercover chat training by the Internet Crimes Against Children (“ICAC”) Task Force. As part of my daily duties as an HSI special agent, I investigate and assist in the prosecution of child exploitation and child pornography-related crimes. As part of my duties, I have been involved in the execution of numerous child exploitation and child pornography-related search warrants as part of both state and federal investigations, as well as serving as the affiant for such search warrants and for criminal complaints.

3. The facts set forth in this affidavit are based on my own personal knowledge, other law enforcement officers, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described here, and information gained through my training and experience. I have not set forth every fact known to me about this investigation. Rather, I have set forth only those facts I believe are necessary to establish probable cause that FARR has violated Title 18, United States Code, Section 2251(a).

PROBABLE CAUSE

4. On December 2, 2024, Oswego County Sheriff's Office ("OCSD") investigators received information that Thomas FARR, a resident of Tennessee, had been exchanging sexually explicit text messages and photographs with V-1 and V-2. V-1 and V-2 are minor female children who are thirteen and twelve years old, respectively, that reside in the Northern District of New York, and their identities and exact dates of birth are known to law enforcement. This information was relayed to OCSD by V-1 and V-2's family members and friends, who also indicated V-2 may have previously had sex with FARR.

5. Law enforcement received consent from V-1 and V-2's legal guardian to forensically examine their electronic devices. The forensic extraction of V-2's cell phone contained text messages between V-2 and phone number (931) XXX-1814. According to the Humphreys County, Tennessee, sex offender registry, this is FARR's phone number. The text messages reveal that in October 2024, FARR asked V-2 for pictures of her face; then later in the conversation, asked for pictures of V-2's "birth mark". On various dates, FARR sent V-2 pictures of a penis, and on various dates at FARR's specific request, V-2 sent FARR pictures of a vagina with a distinct birthmark on it. The content of the text messages is sexual in nature, including a discussion of an occasion when FARR "fingered" V-2.

6. On December 5, 2024, law enforcement learned FARR was traveling from Tennessee to Oswego, New York. OCSD intercepted FARR in Oswego and placed him under arrest. FARR had a loaded handgun tucked into his pants waistband. Investigators seized two cell phones from FARR's person and the vehicle he was operating: a Galaxy A13 cellphone, and a Galaxy A25 cell phone. These cell phones were searched pursuant to a search warrant issued by a New York State judge. Both devices were manufactured outside the State of New York.

7. During the forensic examination of FARR's Galaxy A13 cellphone, investigators found over two dozen cached images depicting a vagina with a distinct birthmark, pictures of which had been sent by V-2 to FARR. Among the cached images was a picture of a dark-haired female child exposing her vagina, identifiable by the distinct birthmark. The child's face is turned toward the camera and part of it is visible, making the child identifiable as V-2. This image confirmed that V-2 was the child depicted in the other cached images found on FARR's Galaxy A13 cellphone. It also confirmed that V-2 had sent images of her vagina to FARR at his request, as observed in V-2's cell phone.

8. FARR's Galaxy A13 cellphone also contained a video of a female child masturbating with an electric toothbrush. The video initially focuses on the child's vagina, then pans up to the child's face. The child in the video is identifiable as V-1. The cell phone also contained additional videos of a female child masturbating with a hairbrush. While the child's face is not visible in these videos, the child's physical characteristics are consistent with those seen in the video in which V-1's face is visible.

9. Deleted Snapchat messages and text messages were also recovered from FARR's Galaxy A13 cell phone. Investigators observed messages between FARR and V-1 dating back to November 2024. The messages between FARR and V-1 are sexual in nature, and detail sexual acts FARR wanted to perform on V-1. In one message dated November 19, 2024, FARR wrote, "Your going to let me fuck you in the ass aren't you." In another message on the same day, FARR wrote, "I'll cum in your ass mouth and face."

10. On December 5, 2024, OCSD investigators performed a digital forensics analysis of V-1's cell phone pursuant to her guardian's previous consent. On the device, investigators found Snapchat messages between V-1 and "Uncle Tom" (FARR) that were timestamped moments before

OCSD encountered FARR at the Walmart in Oswego, NY. One of the messages from FARR to V-1 contains a picture of FARR holding a handgun to his forehead. The message accompanying the photo reads, “I’m not going to prison”. Other messages from FARR encourage V-1 to not “tell anyone” and threaten that if V-1 surrenders her phone to the authorities, V-1 and V-2 will go to a “foster home closest 1 is 200 miles away.” Investigators also recovered videos of a female child masturbating with what appears to be a hairbrush, consistent with the cached images depicting similar child pornography found on FARR’s Galaxy A13 cell phone.

11. In December 2024, V-1 and V-2 were both forensically interviewed. During her interview, V-1 identified herself as the person in the video and images depicting a female child masturbating with an electric toothbrush and hairbrush, found in V-1’s and FARR’s cell phones. V-1 stated she took the images and videos for the purpose of sending them to FARR.

12. Similarly, during her separate forensic interview, V-2 identified herself as the person depicted in the child pornography images depicting a vagina with a distinct birthmark, including images from the text message conversation between V-2 and FARR. V-2 confirmed the images were produced for FARR at his request. V-2 also told the forensic interviewer that during one of FARR’s previous visits to New York, believed to have been in October 2024, FARR took V-1 and V-2 to a historic site. While at the historic site, FARR inserted a finger into V-2’s vagina. V-2 stated that during that same visit, FARR put his penis in V-2’s mouth and ejaculated into her mouth and on her face. V-2 specifically remembered FARR’s ejaculate on her face because she had face paint on at the time.

13. Further review of FARR’s Galaxy A25 cell phone identified several pictures taken on October 5, 2024, at a historic site known as “The Fort” in Oswego County, New York. FARR, V-1, and V-2 are depicted in the photographs. V-2 is seen with face paint on her face.

14. Records obtained from the Tennessee Sex Offender Registry reveal that Thomas FARR is a registered sex offender with classification “V” or “violent.” Tennessee has a three-tiered sex offender system, with “V” corresponding with tier III, the highest level of their classification system. Classification V is reserved for serious felony sex crimes. Additionally, according to the Florida Department of Law Enforcement Sexual Offender/Predator system, prior to 2014, FARR was registered in Florida with the designation “Sexual Predator.” Florida has two sexual offender designations: sexual offender and sexual predator. Sexual predator is the highest level of their classification system, reserved for “sexually violent predators.”

15. A review of FARR’s criminal history and Pinellas County, Florida, court records reveal that on February 13th, 2006, FARR was convicted in Pinellas County, Florida of the following State of Florida felony offenses: two counts of Sexual Battery by a Custodian with a Victim 12 or Older but Younger Than 18; and one count of Removal of a Child from the State During Pendency of a Dependency Proceeding. FARR was sentenced to 10 years in prison. The Tennessee Sex Offender Registration information reports that the victim was 15 years old.

CONCLUSION

16. Based upon the above information, there is probable cause to establish that FARR has violated Title 18, United States Code, Section 2251(a) (sexual exploitation of a child). I respectfully request that the Court issue the proposed criminal complaint and associated arrest warrant pursuant to this violation of federal law.

ATTESTED TO BY THE APPLICANT IN ACCORDANCE WITH THE REQUIREMENTS OF RULE 4.1 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE.

**LINDSEY R
VALENTINO**

Lindsey Valentino
HSI Special Agent

Digitally signed by LINDSEY R
VALENTINO
Date: 2025.01.21 09:58:40 -05'00'

I, the honorable Mitchell J. Katz, United States Magistrate Judge, hereby acknowledge that this affidavit was attested by the affiant by telephone on January 21, 2025, in accordance with Rule 4.1 of the Federal Rules of Criminal Procedure.

A handwritten signature in black ink, reading "Mitchell J. Katz", is written over a horizontal line.

Hon. Mitchell J. Katz
United States Magistrate Judge